

To:

Ms **Ursula von der Leyen**, President of the European Commission,
Mr **Frans Timmermans**, Executive Vice-President for the European Green Deal,
Ms **Kadri Simson**, Commissioner for Energy,
Ms **Adina Valean**, Commissioner for Transport,

Copy to:

Mr **Thierry Breton**, Commissioner for Internal Market,
Ditte Juul Jørgensen, Director General, DG Energy
Mr **Cristian Buşoi**, Chair of the Committee on Industry, Research and Energy in the European Parliament
Ms **Karima Delli**, Chair of the Committee on Transport and Tourism in the European Parliament

Brussels, November 18, 2021

Make European Buildings fit for e-mobility – joint letter

Dear President von der Leyen, Vice-President Timmermans, Commissioner Simson and Commissioner Vălean,

We, the undersigned, two organisations see the upcoming **Revision of the Energy Performance of Buildings Directive (EPBD)** as an essential part for the transition towards zero emission transport in the future. As part of the fit for 55 package in July 2021, the Commission proposed the Alternative Fuels Infrastructure Regulation focusing on the deployment of the recharging and refuelling infrastructure for public use. **EPBD should complement** this regulation with an ambitious proposal ensuring that also **private and semi-public charging** is sufficiently addressed. The EPBD can be an important enabler for reaching the climate targets in the transport sector. An ambitious proposal from the side of the Commission should be based on following principles:

1. “Right To Install a Plug”

The overall long-term objective is to ensure every EV driver should have a possibility and the right to install a charger – usually on own expenses - when purchasing or leasing an electrically chargeable vehicle. The “right to install a plug” means that the legal basis should be created in all member states, that every EV driver is allowed to install a plug.

This principle should guide policy-makers on national and regional levels. Without prejudice to national permitting and planning processes, the Member States shall ensure that the latency between requesting a charger and installation should not exceed 3 months. The Commission should encourage Member States to move in that direction and ensure a harmonised approach towards that principle across the EU. Member States should improve the national legislation to lower the hurdles for customers to move into e-mobility.

2. EV-readiness for the non-residential buildings by 2035

All parking spaces in non-residential buildings should be cabled for EV-charging by 2035. For new buildings and buildings undergoing major renovations, those requirements should apply from 2025 onwards. With respect to the existing buildings, intermediate targets of:

- 10% by 2025
- and 30 % by 2030 should apply.

3. EV readiness for the residential buildings

Availability of the charging infrastructure in the residential buildings will represent the key factor for the successful uptake of electrically chargeable vehicles. Therefore, the EPBD should set clear targets for residential buildings as well, fully respecting the specificities of the housing sector.

In order to ensure favourable conditions for the EV users, the proposal should target:

- Pre-cabling requirements to be applicable for all parking places as from 2025 for all new residential buildings and residential buildings undergoing major renovations.
- For existing buildings, pre-cabling requirements to be applicable for all parking places as from 2035 for buildings with more than 5 parking spaces. An interim target of 30% should be introduced for 2030.

All installations should be ready for smart charging and it should be furthermore ensured that sufficient grid capacity in the network and buildings is planned for a rapid increase in the charging demand.

4. Minimum requirements for Charge Points

For buildings (both residential and non-residential) with more than 10 parking places the following minimum targets for charging points per parking places should apply:

5% for 2025 (min 1 charging point)

10% for 2027 (min 2 charging points)

15% for 2030 (min 3 charging points)

5. Charging at private depots and logistic hubs for trucks and vans

As the battery electric trucks and vans are predicted to see a stark increase in the next decade the scope of the EPBD should include private depots and logistic hubs to enable heavy duty vehicles and vans for overnight-charging and charging while loading and unloading cargo.

6. Ensuring financial support to the EV-readiness

Funding (e.g. through InvestEU, European Investment Bank) should include and prioritize EV charging for buildings (including depots and logistic hubs for trucks and buses). The Commission and co-legislators, including the Member States, should also look into possibilities to utilize new and current financial instruments to stimulate investment into private charging infrastructure.

The Energy Performance of Buildings Directive (EU) 2018/844 (EPBD) is the only EU legislation that addresses private charging. It is therefore crucial to align it with the EU's Green Deal objectives and more specifically with the EU's Sustainable and Smart Mobility Strategy. Therefore, requirements to support the ramp-up of e-mobility should be integrated and interact with the building energy system and a holistic approach must be ensured.

Therefore, we would be delighted if you would accept our request for a meeting, to explain you our position in more detail.

We remain at your disposal for any further assistance.

Yours sincerely,

ACEA



T&E

